

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

In re)
Ramona J. Corbett)
Debtor) Bk. No. 16-10259-BAH
) Chapter 13
)
)

**DEBTOR'S MOTION TO MODIFY CONFIRMED
CHAPTER 13 PLAN DATED MAY 4, 2016**

NOW COMES Ramona J. Corbett (hereinafter "Debtor") in the above-captioned matter, by and through her attorney, Christopher W. Kelley, Esq., and submits the following Motion to Modify Confirmed Chapter 13 Plan. In support of said Motion, the Debtor states as follows:

1. On May 31, 2016, this Court confirmed the Debtor's Amended Chapter 13 Plan dated May 4, 2016.
2. The Debtor's confirmed plan is underfunded due to a creditor filing an amended proof of claim.
3. The Debtor is submitting with this Motion a proposed Modified Plan dated October 13, 2016 which sets forth an increased plan payment for the balance of the term of the plan.

WHEREFORE, the Debtor respectfully requests that this Court enter an order which:

- A. Grants this Motion to Modify Confirmed Plan;
- B. Confirm the Modified Chapter 13 Plan dated October 13, 2016; and
- C. Grant such other relief as is fair and equitable.

Respectfully submitted,

Ramona J. Corbett

By Her Attorney

Date: October 13, 2016

/s/ Christopher W. Kelley
Christopher W. Kelley, Esq.
240 Wellman Avenue, Suite 240
Nashua, NH 03064
(603) 889-7188
BNH #05049

CERTIFICATE OF SERVICE

I hereby certify under the pains and penalties of perjury that I have served a copy of the foregoing **Motion** upon the following persons at the addresses indicated by electronic filing or First Class Mail, Postage prepaid, this 13th day of October, 2016:

Ramona Corbett
217 Naticook Road
Merrimack, NH 03054

Jeffrey J. Hardiman, Esq. (BSI Financial Services, Inc.)
jhardiman@shslawfirm.com

Todd H. Prevett, Esq. (Ally Financial, Inc.)
Tprevettesq1@aol.com

Lawrence Sumski, Esq.
sumski13@gmail.com

United States Trustee
USTPRegion01.MR.ECF@usdoj.gov

And to all creditors and parties set forth on the attached matrix.

/s/ Christopher W. Kelley